

Objection Deadline: February 6, 2024 at 12PM (Eastern Time)

MORRISON COHEN LLP

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Special Litigation and Enforcement Counsel to the Debtors

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

Genesis Global Holdco, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No.: 23-10063 (SHL)

Jointly Administered

**NOTICE OF ELEVENTH FEE STATEMENT THAT OCCURRED IN
THE THIRD FEE APPLICATION PERIOD OF MORRISON
COHEN LLP FOR COMPENSATION FOR SERVICES RENDERED
AND REIMBURSEMENT OF EXPENSES INCURRED AS SPECIAL
COUNSEL TO THE DEBTORS AND DEBTORS-IN-POSSESSION FOR
THE PERIOD FROM DECEMBER 1, 2023 THROUGH DECEMBER 31, 2023**

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| Name of Applicant: | Morrison Cohen LLP |
| Authorized to Provide Services to: | Genesis Global Holdco, LLC, <i>et al.</i> |
| Date of Retention: | An entered order [ECF No. 106], dated February 24, 2023, authorizing retention <i>nunc pro tunc</i> to the PetitionDate (<i>i.e.</i> , January 19, 2023), as applicable for each Debtor. |
| Period for which Compensation and Expenses are Sought: | 12/01/2023 through 12/31/2023 Monthly Fee Statement for December 2023 |
| Amount of Compensation Requested: | \$16,676.50 |

¹ The debtors and debtors-in-possession (collectively, “**Debtors**”) in the above-captioned jointly-administered cases (“**Chapter 11 Cases**”) are: (i) Genesis Global Holdco, LLC (8219); (ii) Genesis Global Capital, LLC (8564); and (iii) Genesis Asia Pacific Pte. Ltd. (2164R). For the purpose of these Chapter 11 Cases, the service address for the Debtors is 250 Park Avenue South, 5th Floor, New York, New York 10003.

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| Less 20% Holdback: | \$3,335.30 |
| Compensation Net of Holdbacks: | \$13,341.20 |
| Amount of Expense Requested: | \$32.00 |
| Total Compensation and Expenses (Net of Holdbacks): | \$13,373.20 |

In accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [ECF No. 101] (“**Interim Compensation Order**”), dated February 24, 2023, Morrison Cohen LLP (“**MC**”) hereby submits this Eleventh Fee Statement for the month of December 2023 (this “**Eleventh Fee Statement**”), seeking compensation for services rendered and reimbursement of expenses incurred as counsel to the Debtors for the period December 1, 2023 through and including December 31, 2023 (“**Tenth Monthly Fee Period**”). By this Eleventh Fee Statement, and after taking into account certain voluntary reductions, MC seeks payment in the amount of \$13,373.20, which comprises (a) 80% of the total amount \$16,676.50) of compensation sought for actual and necessary services rendered during the Tenth Monthly Fee Period and (b) reimbursement in the amount of \$32.00, which comprises 100% of actual and necessary expenses incurred in accordance with such services.

SERVICES RENDERED AND EXPENSES INCURRED

1. Attached hereto as **Exhibit A** is a summary of MC’s professionals by individual, setting forth the: (a) name and title of each individual who provided services for the Tenth Monthly Fee Period; (b) aggregate hours spent by each individual; (c) MC’s current hourly billing rate for each individual that provided services in the Tenth Monthly Fee Period; (d) amount of fees earned by each MC professional; and (d) year of admittance and jurisdiction for each attorney that is included on this Eleventh Fee Statement. The blended hourly billing rate of MC’s timekeepers in the Tenth Monthly Fee Period is approximately \$877.71/hour.

2. Attached hereto as **Exhibit B** is a summary of the services rendered and compensation sought, by project category for the Tenth Monthly Fee Period.

3. Attached hereto as **Exhibit C** is itemized time records of MC's professionals for the Tenth Monthly Fee Period and summary materials related thereto.

4. Attached hereto as **Exhibit D** is a summary of expenses incurred and reimbursement of expenses sought, by expense type, for the Tenth Monthly Fee Period.

5. Attached hereto as **Exhibit E** is an itemized record of all expenses for the Tenth Monthly Fee Period.

NOTICE OF OBJECTION PROCEDURES

6. Consistent with the terms of the Interim Compensation Order, notice of this Eleventh Fee Statement shall be given by email, hand or overnight delivery upon the following parties ("**Notice Parties**"): (a) The Debtors c/o Genesis Global Holdco, LLC, Attn: Arianna Pretto-Sankman (e-mail: arianna@genesistrading.com); (b) Counsel to the Debtors, Cleary Gottlieb Steen & Hamilton, One Liberty Plaza, New York, New York 10006, Attn: Sean A. O'Neal, Esq., Jane VanLare, Esq. (e-mail: soneal@cgsh.com; jvanlare@cgsh.com); (c) The United States Trustee for the Southern District of New York, Alexander Hamilton Custom House, One Bowling Green, Suite 515, New York, New York 10004, Attn: Greg Zipes, Esq. (e-mail: greg.zipes@usdoj.gov); and (d) Counsel to the official committee of unsecured creditors, White & Case LLP, 1221 Avenue of the Americas, 49th Floor, New York, New York 10020, Attn: Philip Abelson and Michele Meises (e-mail: philip.abelson@whitecase.com; michele.meises@whitecase.com) and, 111 South Wacker Drive, Suite 5100, Chicago, Illinois 60606, Attn: Gregory F. Pesce (e-mail: gregory.pesce@whitecase.com).

7. Objections to this Eleventh Fee Statement, if any, must be served upon the Notice Parties, and by e-mail, hand, or overnight delivery, upon MC, 909 Third Avenue, 27th Floor, New York, New York 10022, Attn: Heath D. Rosenblat, Esq. and Jason Gottlieb, Esq. (e-mail: hrosenblat@morrisoncohen.com; jgottlieb@morrisoncohen.com) no later than **February 6, 2024 at 12 PM (Eastern Time) (“Objection Deadline”)**, setting forth the nature of the objection and the specific amount of fees or expenses the objecting party is contesting.

8. If no objections to the Eleventh Fee Statement are received by the Objection Deadline, the Debtors shall pay MC 80% of the fees and 100% of the expenses identified in this Eleventh Fee Statement.

9. To the extent a proper objection to this Eleventh Fee Statement is received on or before the Objection Deadline by MC and the Notice Parties, the Debtors shall withhold payment of just that portion of this Eleventh Fee Statement that the objection contests and promptly pay the remainder of the fees and expenses in the percentages set forth above pursuant to the terms of the Interim Compensation Order. To the extent such objection is not resolved, it shall be preserved and scheduled for consideration at the next interim fee application hearing.

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Dated: New York, New York
January 22, 2024

MORRISON COHEN LLP

By: /s/ Heath D. Rosenblat
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